

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TERRELL JONES,	)	
	)	
Plaintiff,	)	08 C 586
	)	
vs.	)	Honorable Judge
	)	William T. Hart
CARLOS ALTEZ,	)	
SALVADOR GODINEZ	)	Magistrate Judge Brown
	)	
Defendants.	)	

**MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL**

Pursuant to LR83.17 of the United States District Court for the Northern District of Illinois, Eastern Division, the undersigned attorney, Kevin Frey, Assistant State's Attorney of Cook County, moves this Honorable Court for leave to withdraw Romano D. DiBenedetto as attorney of record for Defendants, Carlos Altez and Salvador Godinez in this action and for leave for the undersigned attorney to substitute as counsel and to file his appearance. In support of this motion, the movants state as follows:

1. Defendants, Carlos Altez and Salvador Godinez are represented in this matter by the Office of the Cook County State's Attorney. The State's Attorney assigned to represent the Defendants in this cause of action is Romano D. DiBenedetto.

2. On May 23, 2008, the Torts and Civil Rights Litigation Section of the Office of the State's Attorney of Cook County reassigned litigation responsibilities for this case to Assistant State's Attorney Kevin Frey.

3. Kevin Frey is a duly licensed attorney in the State of Illinois.

4. Plaintiff will not be prejudiced by a substitution of counsel.

WHEREFORE, the undersigned respectfully requests that this Honorable Court grant leave to Romano D. DiBenedetto to withdraw as attorney for the Defendants and allow Kevin Frey to substitute as attorney and enter his appearance as counsel of record for Defendants, Carlos Altez and Salvador Godinez.

Respectfully Submitted,

RICHARD A. DEVINE  
State's Attorney of Cook County

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